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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

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Periodic Reporting	Docket No. RM2012-6

PITNEY BOWES INC. MOTION FOR LEAVE TO FILE REPLY TO USPS RESPONSE TO PETITION FOR INITIATION OF PROCEEDING TO CONSIDER PROPOSED CHANGES IN ANALYTIC PRINCIPLE (JULY 17, 2012)

Pursuant to 39 C.F.R. § 3001.21, Pitney Bowes Inc. (Pitney Bowes) respectfully requests leave to file this Reply to the United States Postal Service's July 12 Response to Petition for Initiation of Proceeding to Consider Proposed Changes in Analytic Principle. Although the Commission's rules do not authorize a reply as a matter of right, 39 C.F.R. § 3001.21(b) allows the Commission to accept such a pleading as a matter of discretion.

On July 12, 2012 Pitney Bowes filed a Petition for the Initiation of a Proceeding to Consider Proposed Changes in Analytic Principle. The Postal Service takes no position on the merits of Pitney Bowes' proposal, but its Response raised several objections as to scope of 39 C.F.R. § 3050.11. This Reply addresses those objections. No party will be prejudiced by the granting of this Motion.

For the foregoing reasons, Pitney Bowes respectfully requests that the Commission accept its Reply to the Postal Service's July 12 Response to Petition for Initiation of Proceeding to Consider Proposed Changes in Analytic Principle.

Respectfully submitted,

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